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15 JUL 22 PM 4:25
CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

DARRYL K. BROWDER, *Dayion L. Barber*

DARNELL ALLEN BROWDER, .

Markayon K. Jones

Karyon L. Browder

Layashan Browder

(Enter above the FULL name of each plaintiff in this action)

"Verified Complaint"

vs.

William Price, Judge John A. Jarvey,
OFFICER VASQUEZ, *Judge John A. Jarvey,*
OFFICER HARDEN, BROADLAWNS MEDICAL CENTER, .

OFFICER ENGLE; STACIE M. CODR;
OFFICER J. DEMOSS, . *Gregory Brandt,*

THE STATE OF IOWA,
POLK COUNTY, KELLEN BROOKS BUBACH;

LATOYA D. FAALAFULA, . *Joseph Seidlin*
IOWA SECRETARY OF STATE, *Robert B. Hanson*

THE CITY OF DES MOINES;
WILLIAM GRAHAM, *Judges Martha Mertz,*

(Enter above the FULL name of each defendant in this action) *individually and in their official capacity.*

COMPLAINT

* THE PLAINTIFF'S WAS DE
*/NIED EVIDENCE TO THE
* COURT TO PROVE OUR
* CASES, UNDER BRADY V.
* MARYLAND: THE STATE PRO
* SECUTORS, VIOLATED THE
* CONSTITUTIONAL RIGHT
* IMPLICATED BY ALLEGED
* SUPPRESSION OF EXCUL/
* PATORY EVIDENCE IS
* EXPLAINED IN BRADY V.
* MARYLAND. "THE SUPPRES/
* SION BY THE PROSECU/
* TION OF EVIDENCE FAVO/
* RABLE TO AN ACCUSED
* UPON REQUEST VIOLATES
* DUE PROCESS WHERE THE

EVIDENCE IS MATERIAL EITHER TO GUILT OR TO PUNISHMENT, IRRESPEC/
TIVE OF THE GOOD FAITH OR BAD FAITH OF PROSECUTION." 373 U.S. 83, 87
, S.Ct. 1194, 10 L.Ed.2d 215 (1963). THE SUPREME COURT STATED IN CAL/
IFORNIA V. TROMBETTA, WITH RESPECT TO THE DUE PROCESS CLAUSE OF THE
FOURTEENTH AMENDMENT: "WE HAVE LONG INTERPRETED THIS STANDARD OF
FAIRNESS TO REQUIRE THAT CRIMINAL DEFENDANTS BE AFFORDED A MEAN/
INGFUL OPPORTUNITY TO PRESENT A COMPLETE DEFENSE. TO SAFEGUARD
THAT RIGHT, THE COURT HAS DEVELOPED WHAT MIGHT LOOSELY BE CALLED
THE AREA OF CONSTITUTIONALLY GUARANTEED ACCESS TO EVIDENCE." 467
U.S. 479, 485, 104 S.Ct. 2528, 81 L.Ed.2d 413 (1984). THE RIGHT BRADY
DESCRIBES DEFINITELY APPLIES TO PROSECUTORS AND IMPOSES UPON
THEM AN ABSOLUTE DISCLOSURE DUTY. THE PROSECUTOR, FOR THE STATE
INTENDED TO DEPRIVE THE PLAINTIFF'S OF A FAIR TRIAL. PLAINTIFF'S
CLAIMS ALSO ALLEGE BAD FAITH UNDER BRADY.

Parties

(In item A below, place your name in the first blank and place your present address and telephone number in the second blank. In the third blank write the state where your home is ("Home State"). In item B below, do the same for additional plaintiffs, if any.)

A. Name of Plaintiff DARRYL KEITH BROWDER,
 Address & Telephone Number P.O. BOX 41413 DES MOINES, IOWA 50311,
515/525/5636
 Home State IOWA

B. Additional Plaintiffs (include addresses, telephone numbers and home state for each)

DARNELL ALLEN BROWDER, 1817 10th STREET DES MOINES, IOWA 50314
PHONE NUMBER 515/339/3425, HOME STATE IOWA. Mark Kevin Jones, and
Karyon L. Browder, Darnell Barber, Larysha N. Browder, Home
state of Iowa, P.O. Box 41413 Des Moines, Iowa 50311, ph # 515/525/5636

(In item C below, place the **FULL** name of the defendant in the first blank place, the address and telephone number for the defendant in the second blank. In the third blank, write the state in which the defendant has his/her home. If the defendant is a corporation, list the location of its home office, and the state where it is incorporated, if known. If the defendant is a government agency, simply name it. In item D, do the same for additional defendants, if any.)

C. Name of defendant william graham, attorney at law graham ervanian
& cacciatore llp 317 6th avenue, suite 900 DES
 Address & Telephone Number MOINES, IOWA 50309. HOME STATE IOWA, PHONE 515282-
9400, FAX: 515-282-4235.
 Home State IOWA

Emily Nieman, 2309 EUCALYPTUS AVE Des Moines, IA 50310. Home state IOWA.

D. Additional Defendants (include addresses, telephone numbers and home state for each).

LATOYA D. FAALAFULA, 101-2nd avenue apartment 118 DES MOINES,
IOWA 50309. PHONE NUMBER 515/745/6118, home state iowa.

MARK GODWIN, GARY D. GOUDELOCK, JR; THE CITY OF DES MOINES; vas/
quez; harden; engle; j. demoss; 400 robert d. ray dr DES MOINES, IA
50309. phone number 515/283/4125, home state iowa. broadlawns medical center

THE COUNTY "ROBERTA CRUZ, MARK SANDON, 111 court ave., rm. 340
DES MOINES, IOWA 50309. ph: 515-286-3341, home state iowa.

state of iowa, and iowa secretary of state, hoover state off/
ice bldg., 2nd floor 1305 e. walnut DES MOINES, IOWA 50319, home
state iowa. KELLEN BROOKS BUBACH, STACIE M. CODR; 699 walnut st

STATEMENT OF CLAIM suite 1900 DES MOINES, IOWA 50309, home state
iowa. broadlawns medical center, 1801 hickman rd
, DES MOINES, IOWA 50314, phone number 515/282/22
00, home state IOWA. Gregory William Price, Joseph Seidlin,

*Karilyn Heston, polk
 County Attorney's
 Office 222 Fifth
 Avenue Des Moines, IA
 50309 Home state Iowa.*

*Robert B. Hanson, polk County Court House 500 mulberry
 street Des Moines, Iowa 50309. Home state Iowa.
 John A. Jarvey, Clerk United States District Court U.S. Court House
 P.O. Box 9344 Des Moines, Iowa 50309-9344. Home State Iowa*

*County Hospital Broadlawns
 Medical Center.*

(State briefly **EXACTLY** what you want the Court to do for you. Make no legal arguments.

Cite no cases or statutes.)

We ask for Damages at the maximum Legal Rate.

Wherefore plaintiff prays this court issue equitable Relief as follows:

1. issue Injunctive Relief commanding Defendants to:
2. issues Declaratory Relief as this court Deems appropriate Just.
3. issue other relief as this court Deems appropriate and Just. and award
- plaintiff's his costs of litigation. 4. issue Liquidated Damages. and
5. issue substantial damages for injuries. 6. issue Compensatory Damages and
- Punitive Damages. 7. issue Statutorily Authorized compensatory Damages.
8. issue nominal Damages. 9. issue General compensatory Damages. and
10. issue special Damages, provision Damages. 11. issue Exemplary Damages. and

I ask this court to Fine Emily nieman, and Kailyn Heston, and I ask this court
Signature(s) of Plaintiff(s) for Five years Prison time for Both nieman, and Heston.
and take their License for Life, and Fine them Both.

Signed this 23 day of July

2015

and for Damages for Lowered
Quality of Life, and for
embarrassment, Punitive
Damages.

Darrell K. Browder
 (Signature of Plaintiff)

515-525-5636
 (Area Code)-Telephone Number

Koryon L. Browder

515/525/5636

Markavian K. Jones

515/525/5636

Dayion L. Barber

515/525/5636

Layashia N. Browder

515/525/5636

Darrell A. Browder

(State here as briefly as possible the **FACTS** of your case. You **MUST** state **EXACTLY** what each defendant personally did, or failed to do, which resulted in harm to you. State the date **AND** place of all events. Attach an extra sheet if necessary, and write the heading "Part II Continued" at the top of the sheet. Keep to the facts. Do not give any legal arguments or cite any cases.)

WILLIAM GRAHAM, HE IS IN VIOLATION OF BAD FAITH, AND BRADY V. MARYLAND. AND INEFFECTIVE ASSISTANCE OF ~~COUNSEL~~, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, NEGLIGENCE, SEVERE OR EXTREME EMOTIONAL DISTRESS, VIOLATION OF PLAINTIFF'S, FOURTH AND FOURTEENTH AMENDMENT RIGHTS. WILLIAM GRAHAM, HID THE MOTION FOR LIMINE, AND ANYTHING THAT WAS WROTE UP IN THIS DOCUMENT FROM THE PLAINTIFF'S. AND ALSO WILLIAM GRAHAM, NEVER DISCUSSED ANY MOTION FOR LIMINE TO PLAINTIFF'S, ON CASE NUMBER BROWDER V. CAM, 4:04-cv-00630-RAW, DOC. NO. 140 (S.D. IOWA 2010). (MANDATE ISSUED DEC. 31, 2009).

LATOYA D. FAALAFULA, SHE VIOLATED PLAINTIFF, DARRYL K. BROWDER, FOURTH, AMENDMENT RIGHTS. AND SHE HELPED THE CITY AND THEIR POLICE OFFICER S, FRAME ME TIME AFTER TIME. SHE IS IN VIOLATION OF FRAUD, HARASSMENT, NEGLIGENCE, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, AND SEVERE OR EXTREME EMOTIONAL DISTRESS, LOSS OF WAGES UP TO 8 YEARS, BAD FAITH, CONSPIRACY, AND DOUBLE JEOPARDY, FALSE REPORTS, FALSE ARREST, .

CITY OF DES MOINES, VASQUEZ; HARDEN; ENGLE; J. DEMOSS; gary d. goudelock, jr.; mark godwin; they are in violation of fraud, harassment, discrimination, false report, false arrest, violation of plaintiff, as darryl k. browder, fourteenth, fifth, and fourth, ~~eighth~~, amendment rights. BAD FAITH, DUE PROCESS OF LAW, NEGLIGENCE, SEVERE OR EXTREME EMOTIONAL DISTRESS, FRAUD, LOSS OF WAGES, DOUBLE JEOPARDY, CONSPIRACY, VIOLATION OF BRADY V. MARYLAND, CONTEMPT OF COURT, ~~personal injury~~. (If you know, BRIEFLY state what SPECIFIC law of constitutional provisions defendant(s) violated.)

CONTEMPT OF COURT, FALSE ARREST, FALSE REPORTS, DUE PROCESS OF LAW.

AS BAD FAITH, DOUBLE JEOPARDY, CONSPIRACY, LOSS OF WAGES, FRAUD, SEVERE OR EXTREME EMOTIONAL DISTRESS, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, HARASSMENT, DISCRIMINATION, VIOLATION OF THE PLAINTIFF'S, FOURTH, AND FIFTH, AND FOURTEENTH, ~~ninth~~, FIRST, SIXTH,

AMENDMENT RIGHTS TO THE CONSTITUTION. PUNITIVE DAMAGES, INEFFECTIVE ASSISTANCE OF COUNSEL, NEGLIGENCE, AND VIOLATION OF THE TORT CLAIM

ACT OF IOWA UNDER VIOLATION OF CO-CONSPIRATOR LIABILITY RECOGNIZED IN PINKERTON V. UNITED STATES. UNITED STATES V. BECKER, 892 f. 2d 265, 268 (3d cir. 1989) UNITED STATES V. GARCIA-ROSA, 876 f. 2d 209, 228-29 (1st cir. 1989). UNITED STATES V. PUNGITORE, 910 f. 2d 1084, 1105 (3rd cir. 1990); united states vs. heidecke, 900 f. 2d 1155, 1160 (7th cir. 1990); united states vs. parcel of land, 884 f. 2d 41, 43 (1st cir. 1989); united states v. scarfo, 711 f. supp. 1315 (e.d. pa. 1989).

VIOLATION OF THE TORT CLAIM ACT UNDER SECTIONS 669.4 AND 669.13 OF THE 2013 code of iowa, AND PERSONAL INJURY, STALKING UNDER CODE

CH. 236, .

RELIEF

"PART II CONTINUED":

KELLEN BROOKS BUBACH; STACIE M. CODR; THEY ARE IN VIOLATION OF FRAUD
BAD FAITH, DUE PROCESS OF LAW, .AND SEVERE EMOTIONAL DISSTRESS,
CONTEMPT OF COURT, DOUBLE JEOPARDY, CONSPIRACY, LOSS OF WAGES. AND
INTENTIONAL INFLICTION OF EMOTIONAL DISSTRESS, HARASSMENT, DISCRI/
MINATION, VIOLATION OF THE PLAINTIFF, FOURTH, AND FIFTH, FOURTEENTH,
eight, FIRST, AND SIXTH, AMENDMENT RIGHTS TO THE CONSTITUTION.
PUNITIVE DAMAGES, NEGLIGENCE, AND CO-CONSPIRATOR LIABILITY, .

BROADLAWNS MEDICAL CENTER'S; THE COUNTY; MARK SANDON; ROBERTA CRUZ;
ARE IN VIOLATION OF DUE PROCESS OF LAW, AND BAD FAITH, FALSE ARREST
FALSE REPORTS, CONTEMPT OF COURT, DOUBLE JEOPARDY, .AND CONSPIRACY,
LOSS OF WAGES, FRAUD, SEVERE OR EXTREME EMOTIONAL DISTRESS, INTEN/
TIONAL INFLICTION OF EMOTIONAL DISSTRESS, .HARASSMENT, DISCRIMINA/
TION, AND THE DEFENDANTS ARE IN VIOLATION OF PLAINTIFF, FOURTH, AND
FIFTH, AND FOURTEENTH, *eight*, FIRST, SIXTH, AMENDMENT RIGHTS TO THE
CONSTITUTION. PUNITIVE DAMAGES, AND VIOLATION OF CO-CONSPIRATOR
LIABILITY RECOGNIZED IN PINKERTON V. UNITED STATES. UNITED STATES
V. BECKER, UNITED STATES V. GARCIA-ROSA, UNITED STATES V. PUNGITORE, .
AND UNITED STATES VS. HEIDECKE, UNITED STATES VS. PARCEL OF LAND,
UNITED STATES V. SCARFO, .

THE STATE OF IOWA, AND THE IOWA SECRETARY OF STATE; THEY ARE IN
VIOLATION OF DUE PROCESS OF LAW, AND BAD FAITH, SEVERE EMOTIONAL
DISSTRESS, FALSE REPORTS, FALSE ARREST, VIOLATION OF THE TORT CLAIM
ACT UNDER SECTIONS 669.4 AND 669.13 OF THE 2013 CODE OF IOWA.
CONTEMPT OF COURT, DOUBLE JEOPARDY, CONSPIRACY, LOSS OF WAGES, .
FRAUD, INTENTIONAL INFLICTION OF EMOTIONAL DISSTRESS, HARASSMENT,
DISCRIMINATION, AND VIOLATION OF PLAINTIFF, AS DARRYL KEITH. BROWDER

"PART II CONTINUED":

FOURTH, AND FIFTH, FOURTEENTH, ~~EIGHTH~~ FIRST, SIXTH, AMENDMENT RIGHTS TO THE CONSTITUTION. PUNITIVE DAMAGES, AND VIOLATION OF CO-CONSPIRATOR LIABILITY RECOGNIZED IN PINKERTON V. UNITED STATES. AND UNITED STATES V. BECKERS, UNITED STATES V. GARCIA-ROSA, UNITED STATES V. PUNGITORE, UNITED STATES V. HEIDECKE, UNITED STATES V. PARCEL OF LAND, AND UNITED STATES V. SCARFO, . THIS IS PLAINTIFF'S AS DARRYL K. BROWDER, AND PLAINTIFF, AS DARNELL ALLEN. BROWDER, RECAST PETITION, OR PLAINTIFF'S AMEND PETITION TO THIS COURT.

PART II CONTINUE PAGE

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DHS WORKER AS A EMILY NIEMAN, SHE CAME OVER TO MY HOME IN THE MONTH OF APRIL, 2015, .I LET HER IN MY HOME, THE KIDS WAS AT THEIR SCHOOLS, A EMILY NIEMAN, TOLD ME THAT SHE JUST CAME FROM ALL THE KIDS SCHOOLS AND TALKED WITH THEM ALL. I TOLD HER THAT I DID NOT GIVE HER MY PERMISSION TO TALK TO MY KIDS. SHE STATED THAT DARRYL IM WITH DHS, WE CAN DO WHAT WE WANT TO DO WITH OUT YOUR PERMISSION OR THE KIDS MOTHER PERMISSION. I HAD A PROTECTED ORDER FILED AT THAT TIME ON A LATOYA D. FAALAFULA, .THEN A EMILY NIEMAN, STATED THAT SHE WILL BE GETTING BACK WITH ME OVER WHAT HAPPEN IN MY HOME ON MARCH/31/2015, WHEN A LATOYA D. FAALAFULA, WENT TO JAIL. I TOLD HER I WOULD THINK ABOUT HER HOLDING A CHILD AND NEGLECT AND ABUSE MEETING IN MY HOME CAUSE OF CONFLICT OF INTEREST RULE ON OTHER DHS WORKERS. A WEEK LATER A EMILY NIEMAN, CALLED ME ON A MONDAY OF 2015, .SHE STATED THAT MR. BROWDER, WE WILL BE COMING OVER TO YOUR HOME TO HAVE A INTERVIEW ABOUT CHILD AND NEGLECT AND ABUSE IN YOUR HOME WITH YOUR KIDS. AND WE WILL BE TALKING TO YOU AND YOUR KIDS ABOUT WHAT HAPPEN THAT NIGHT WHEN YOU AND A LATOYA D. FAALAFULA, WAS FIGHTING AND MS. FAALAFULA, WENT TO JAIL. THEN PLAINTIFF, AS DARRYL K. BROWDER, STATED THAT I HAVE TOLD YOU ABOUT THE CONFLICT OF INTEREST I HAVE ON MEMBERS IN YOUR DEPART/MENT, AND MY KIDS ARE SAFE OVER HERE. THEN A EMILY NIEMAN, STATED SO MR. BROWDER, THATS THE WAY YOU GOING TO PLAY THIS SINCE WE ARE NOT WRITTING ANYTHING UP ON YOU. PLAINTIFF, STATED THAT IM NOT PLAYING NO GAMES WITH NON OF YOU. ALL OF YOU BE WRITING UP FALSE REPORTS UP ON ME. IM SCARED TO BE AROUND ANY OF YOU ALL. THEN A EMILY NIEMAN, STATED THAT WELL IM GOING TO GO DOWN TOWN AND TALK TO THE JUDGE AND THE COUNTY ATTORNEY TO SEE WHAT THEY GOT TO SAY ABOUT THIS CASE. THEN PLAINTIFF, AS DARRYL K. BROWDER, STATED WELL GET BACK WITH ME, CAUSE YOU KNOW MY PHONE NUMBER. THE NEXT WEEK OR

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ONE WEEK LATER A EMILY NIEMAN,CALLED THE PLAINTIFF,AS A DARRYL K.BROWDER,AND ASK ME WHERE WAS ALL MY KIDS CAUSE THEY WAS NOT IN SCHOOL TODAY.I STATED THAT IM IN COURT CAUSE I HAD A HEARING TO DAY ON ONE OF MY LAWSUITS.THE NEXT THING I KNEW I WAS SHOCKED TO DEATH BY WHAT A EMILY NIEMAN,SAID TO ME.SHE SAID IM TAKING ALL OF YOUR KIDS OUT OF YOUR MOM NOW.PLAINTIFF,STATED WHY,THEN A EMILY NIEMAN,STATED THAT CAUSE YOU AND A LATOYA D.FAALAFULA,BEEN FIGHTING AGAIN.YOU TWO HAVE BEEN FIGHTING AROUND THOSE KIDS TWICE IN APRIL/9th/2015,AND ON APRIL/10th/2015,.PLAINTIFF,STATED THAT I HAVE NOT EVEN SEEN A LATOYA D.FAALAFULA,PLUS SHE STAY WITH HER BOY FRIEND ON 13th STREET IN DES MOINES,IOWA.PLUS I HAVE A PROTECTED ORDER FILED ON A LATOYA D.FAALAFULA,YOU KNOW A LATOYA D.FAALAFULA,IS NOT OVER TO MY HOME.AND YOU KNOW WE CAN NOT BE AROUND EACH OTHER.THEN I TOLD THE DHS WORKER AS A EMILY NIEMAN, THAT IM GOING TO SUE THE HELL OUT OF HER FOR VIOLATING ME AND MY KIDS CONSTITUTIONAL RIGHTS TO THE CONSTITUTION.THEN A EMILY NIEMAN,STATED WELL SUE ME DARRYL,IM WITH DHS,I CAN DO WHAT I WANT TO DO.SHE PLACED ALL OF MY KIDS WITH MY SISTER AS BARBARA SUE. BROWDER,.AND STOPED ALL OF MY KIDS SSI,CHECKS FOR 30 DAYS.NOW SHE STATED THAT NON OF THE KIDS NEED TO BE ON SSI,.A EMILY NIEMAN,SHE DISCRIMINATED AGAINST ALL PLAINTIFF'S CAUSE WE ARE BLACK,AND SHE STOPED ALL OF MY LEGAL AND CIVIL CASES.AND SHE DESTROYED MY CASE AND CREDIT HISTORY.AND A EMILY NIEMAN,VIOLATED PLAINTIFFS,PROBABLE CLAUSE,AND OUR WARRANT CLAUSE RIGHTS.AS WELL AS OUR SEIZURE CLAUSE UNDER THE 14th AND 4th,AND 5th AMENDMENTS TO THE CONSTITUTION.AND SHE VIOLATED OUR ANONYMOUS CALLS UNDER THE 4th,14th,5th,AMENDMENT TO THE CONSTITUTION.AND SHE VIOLATED OUR PARENTAL RIGHTS AS FUNDAMENTAL AND DUE PROCESS CLAUSE

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UNDER THE 14th, AND 5th, AND 9th, AND 6th, AMENDMENT RIGHTS TO THE CONSTITUTION. AND A EMILY NIEMAN, VIOLATED OUR EQUAL PROTECTION CLAUSE UNDER THE FOURTEETH AMENDMENT TO THE CONSTITUTION. YICK WOV. HOPKINS, 118 us 355, (1886) THE PLAINTIFF'S ASK THIS COURT TO FIRE DHS WORKER AS A EMILY NIEMAN, FOR LYING TO THE JUDGE AND LYING TO THE COUNTY ATTORNEY STATING THAT MY KIDS WAS IN IMMEDIATE DANGER WHILE STAYING IN MY HOME. AND TAKE HER SOCIAL WORKER LICENSE FOR LIFE. AND WE ASK FROM A DHS WORKER AS A EMILY NIEMAN, 9.1. DAMAGES, 9.1.A. COMPENSATORY DAMAGES, PUNITIVE DAMAGES, .AND LIQUIDATED DAMAGES, SUBSTANTIAL DAMAGES, FOR INJURIES. AND FOR STATUTORILY AUTHORIZED COMPENSATORY DAMAGES, .AND NOMINAL DAMAGES, .AND GENERAL COMPENSATORY DAMAGES, AND WE ASK THIS COURT FOR SPECIAL DAMAGES PROVISIONS, .AND GENERAL DAMAGES IN TANGIBLE, PSYCHOLOGICAL INJURIES AS WELL AS FINANCIAL, PROPERTY, OR PHYSICAL HARMS PROXIMATELY CAUSED BY THE WRONGFUL CONDUCT. COMPENSABLE LOSSES MAY INCLUDE MEDICAL BILLS, LOST OR DIMINISHED EARNINGS, LOST PROFITS. PROPERTY DAMAGE, OR LOSS, PAIN AND SUFFERING, OR MENTAL AND EMOTIONAL DISTRESS. AND WE ASK FOR EXEMPLARY OR PUNITIVE DAMAGES TO DETER OR PUNISH MALICIOUS DEPRIVATIONS OF RIGHTS, TO THE CONSTITUTION. AND FOR LOSS OF QUALITY OF LIFE AND WE ASK FOR DAMAGES FOR VIOLATION OF OUR DOUBLE JEOPARDY CLAUSE TO THE CONSTITUTION, .AND WE ASK FOR DAMAGES FROM A EMILY NIEMAN, FOR LYING UNDER OATH, .AND FOR GETTING MY KIDS RECORDS AND MY AS DARRYL KEITH. BROWDER, PROVIDER RECORDS. AND FOR VIOLATING OUR BREACH CLAUSE, AND OUR HIPAA, CLAUSE TO THE CONSTITUTION, .AND UNDER CAREY V. PIPHUS AND MEMPHIS, COMPENSATORY DAMAGES UNDER 42 U.S.C. § 1983. AND FOR VIOLATING OUR TRUTH IN LENDING ACT. 1.2.3.4, .

21 U.S. CODE § 963-ATTEMPT AND CONSPIRACY. AND PLAINTIFF, AS DARRYL ASK THIS COURT FOR LOSS OF WAGES, AT THE MAXIMUM LEGAL RATE.

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ALSO THE PLAINTIFF'S WANT TO STATE THAT A EMILY NIEMAN, HAS NOT VIOLATED ANY JUDICIAL ACT OF CONDUCT. IN THIS CASE THERE IS NO IMMUNITY BECAUSE ALL THE ACTS THAT TOOK PLACE ARE KNOWN AS NON-JUDICIAL ACTS. A NON-JUDICIAL ACT IS SOMETHING THAT IS NOT PROTECTED BY IMMUNITY, A EMILY NIEMAN, .SHOULD NOT BE ABLE TO AVAIL HER SELF OF ANY IMMUNITY. "JURISDICTIONAL BASIS" PLAINTIFF'S CLAIMS FEDERAL JURISDICTION PURSUANT TO ARTICLE III § 2 WHICH EXTENDS THE JURISDICTION TO CASES ARISING UNDER THE U.S. CONSTITUTION. II PLAINTIFF'S, BRINGS THIS SUIT PURSUANT TO TITLE 42 U.S. CODE § 1983 FOR VIOLATIONS OF CERTAIN PROTECTIONS GUARANTEED TO US BY THE FIRST, FIFTH, EIGHTH, NINTH, FOURTEETH, AND FOURTH AMENDMENTS OF THE FEDERAL CONSTITUTION, BY THE DEFENDANT UNDER COLOR OF LAW, IN HER OWN CAPACITY AS A DHS SOCIAL WORKER. A EMILY NIEMAN, VIOLATED OUR CONSTITUTIONAL RIGHTS WHEN SHE WROTE UP AND FILED TWO CHILD IN NEED OF ASSISTANCE AS ABUSE AND NEGLECT DOCUMENTS THAT WAS FALSE. UNDER IOWA CODE SECTION(S) 232.2(6)(c)(2) AND 232.2(6)(N). AND A EMILY NIEMAN, IS IN VIOLATION IN FILING A REMOVAL ORDER WITHOUT PROBABLE GROUND, RULES, RIGHTS, WARRANT, CONSENT, EVIDENCE, FILED ON APRIL/09/2015, .AND SHE IS IN VIOLATION FOR FILING A PETITION WITH ATTORNEY HESTON, FILED 04,13/15, AND ON 04/14/15, . PLAINTIFF'S ALSO WANT DAMAGES FOR FOLLOWING BOTH COURT ORDERS AS JUDGE PRICE AND JUDGE JOSEPH SEIDLIN, COURT ORDERS. FOR ANY DRUG CLASSES, AND FOR ANY DOMESTIC ABUSE CLASSES, .AND FOR ANY ALCOHOL CLASSES, AND FOR ANY DRUG UAS, AND FOR ANY THERAPIST SESSIONS, AND FOR ANY OTHER CLASSES THAT JUDGE JOSEPH SEIDLIN, HAD ME AND THE PLAINTIFF'S DO UNDER DHS AND A EMILY NIEMAN, DISCRETION.

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ATTORNEY AS KAILYN HESTON, SHE KNEW SHE DID NOT HAVE ANY EVIDENCE TO PROSUE THESE CHILD NEGLECT, AND ABUSE CASES AS CASES jv238648, jv238649, jv238659, jv238651, .BY DOING SO SHE VIOLATED OUR 1st, 4th, 5th, 6th, 8th, 9th, 14th, AMENDMENTS TO THE CONSTITUTION. THESE CHILD NEGLECT AND ABUSE CASES ARE UNDER FEDERAL QUESTION JURISDICTION. AND UNDER FEDERAL SUBJECT MATTER JURISDICTION. THE DEFENDANT AS A KAILYN HESTON, KNEW REMOVAL OF THESE CASES UP ABOVE WAS GOVERNED BY STATE. 28 U.S.C. § 1441 ET SEQ. SHE ALSO VIOLATED OUR CONFLICT OF INTEREST RIGHTS AND VIOLATED PROTECTED ORDERS. UNDER RULE LR 1. (1); OR (2). DEFENDANT AS KAILYN HESTON, HAS MADE A ATTEMPT IN BAD FAITH TO EVADE FEDERAL QUESTION JURISDICTION. AND SUBJECT MATTER JURISDICTION ON EACH CHILD AND NEGLECT AND ABUSE CASES UP ABOVE. ALSO ATTORNEY KAILYN HESTON, HAS NOT VIOLATED ANY NON-JUDICIAL ACTS, SHE HAS VIOLATED ALL OUR FEDERAL CONSTITUTIONAL RIGHTS. AS OUR 1st, 4th, 5th, 6th, 8th, 9th, 14th, AMENDMENTS TO THE CONSTITUTION. IN THIS CASE THERE IS NO IMMUNITY BECAUSE ALL THE ACTS THAT TOOK PLACE ARE KNOWN AS NON-JUDICIAL ACTS. A NON-JUDICIAL ACT IS SOMETHING THAT IS NOT PROTECTED BY IMMUNITY. ATTORNEY AS KAILYN HESTON, AS THE DEFENDANT SHOULD NOT BE ABLE TO AVAIL HER SELF OF ANY IMMUNITY. ATTORNEY AS KAILYN HESTON, VIOLATED OUR CONSTITUTIONAL RIGHTS UNDER COLOR OF LAW. IN HER OWN CAPACITY AS A POLK COUNTY ATTORNEY. AND WE ARE SUING A KAILYN HESTON, IN HER OWN CAPACITY. A KAILYN HESTON, VIOLATED OUR CONSTITUTIONAL RIGHTS BY FILING A FALSE PETITION AS 4 PETITIONS ON THE PLAINTIFF'S, ON 04/14/2015, AND ON 04/13/2015, .WITH FLIMSY EVIDENCE AND SHE WILLFULLY FILED ALL FOUR OF THESE PETITIONS AS FRAULENT PETITIONS WITH OUT ANY SUPPORTING EVIDENCE AT ALL. ALSO SHE VIOLATED OUR SEIZURE CLAUSE. AS WELL AS OUR WARRANT CLAUSE, AND OUR ANONYMOUS CALL CLAUSE, .AND OUR PROBABLE CLAUSE UNDER THE WARRANT CLAUSE.

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COMPANION SHIP(PAID TO FAMILY MEMBERS TO TAKE CARE OF ALL MY KIDS FROM WRONGFUL ACTS BY ATTORNEY AS KAILYN HESTON, .AND WE WANT DAMAGES FOR LOWERED QUALITY OF LIFE.AND FOR EMBARRASSMENT,AND FOR THE GRUESOMENESS OF THE INJURY, .AND THE SKILL OF THE ATTORNEY AS A KAILYN HESTON, .PLAINTIFF'S,ASK THIS COURT FOR DAMAGES AS DAMAGES FOR DEFENDANT AS KAILYN HESTON,VIOLETION OF OUR CONSTITUTIONAL RIGHTS WE WANT DAMAGES FOR VIOLATION OF OUR SEIZURE CLAUSE AND OUR WARRANT CLAUSE, .AND FOR OUR ANONYMOUS CALLS CLAUSE,AND FOR OUR PROBABLE CLAUSE, .AND FOR OUR PARENTAL RIGHTS AS FUNDAMENTAL,AND DUE PROCESS CLAUSE OF THE 14th,5th,9th,AMENDMENT TO THE CONSTITUTION.AND WE WANT DAMAGES FOR VIOLATING OUR EQUAL PROTECTION CLAUSE OF THE FOURTEENTH AMENDMENT.YICK WO V.HOPKINS, 118 US 355,(1886).AND WE ASK THIS COURT FOR DAMAGES FROM THE DEFENDANT AS KAILYN HESTON,FOR 9.1.DAMAGES 9.1,A.COMPENSATORY DAMAGES,PUNITIVE DAMAGES, .AND FOR LIQUIDATED DAMAGES,AND FOR SUBSTANTIAL DAMAGES FOR INJURIES, .AND FOR STATUTORILY AUTHORIZED COMPENSATORY DAMAGES, .AND WE WANT DAMAGES FOR NOMINAL DAMAGES,AND GENERAL COMPENSATORY DAMAGES,AND SPECIAL DAMAGES PROVISIONS.AND FOR GENERAL DAMAGES,IN TANGIBLE,PSYCHOLOGICAL INJURIES AS WELL AS FINANCIAL,PROPERTY OR PHYSICAL HARMS PROXIMATELY CAUSED BY THE WRONGFUL CONDUCT.COMPENSABLE LOSSES MAY INCLUDE MEDICAL BILLS. LOST OR DIMINISHED EARNINGS,AND LOST PROFITS,PROPERTY DAMAGES OR LOSS,PAIN AND SUFFERING,OR MENTAL AND EMOTIONAL DISTRESS.AND ALSO EXEMPLARY OR PUNITIVE DAMAGES TO DETER OR PUNISH MALICIOUS DEPRIVATIONS OF OUR RIGHTS TO THE CONSTITUTION.UNDER CAREY V. PIPHUS AND MEMPHIS,COMPENSATORY DAMAGES UNDER 42 u.s.c.§ 1983. AND FOR VIOLATING THE TRUTH IN LENDING ACT.1,2,3,4, .and U.S. CONST.AMEND.1,u.s.const.amend.IV,AND MASS.GEN.LAWS CH.272 § 99 GLIK V.CUNNIFFE,655 F.3d 78(1st cir.2011.21 u.s.c.848, .AND 21 u.s.c.§ 841(a)(1).AND 18 u.s.c.§ 2071,AND 21 u.s.c.§ 846,21 u.s.c.

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§ 963, AND 18 u.s.c. § 1503, AND 21 u.s.c. 52, AND 18 u.s.c. § 401(3).
 AND 18 u.s.c. § 371, AND U.S.C. § 1956(a)(1), AND U.S.C. § 1512(9)1
 (A) 18 u.s.c. § 401(3), AND U.S.C. 1956, AND FOR VIOLATION OF INPOR/
 PER INFLUANCE, AS DOUBLE JEAPERDY, .DESTRUCTION OF EVIDENCE, OR
 DECEIT 1513 1505, 371, 1503, 18 u.s.c. 1512 CRS REPORT RL34303
 § 1505. obstruction of proceeding, .and 18 us code chapter 73-
 OBSTRUCTION OF JUSTICE LEGAL. 18 u.s.c. 2071 concealment, removal,
 or mutilation generally. paragraph(A)(B) (AMENDED NOV. 5, 1990,
 PUBLIC LAW 101-510, sec. 552(a), 104 stat. 1566; sept. 13, 1994, public
 law 103-322. AND sec. 330016(1)(I), 108 stat. 2147.) JUNE 25, 1948, ch. 6
 45, 62 stat. 795; pub. l. 101-510, div. a title v. § 552(A), NOV. 5, 1990,
 104 stat. 1566; pub. l. 103-322, title XXXIII, § 330016(1)(I), SEPT. 13,
 1994, 108 stat. 2147.) 21 u.s. code § 963-ATTEMPT AND CONSPIRACY. AND
 CONTINUING CRIMINAL ENTERPRISE 21 u.s.c. § 848(i) LEGAL INFORMATION
 INSTITUTE-CORNELL UNIVERSITY. THE ACT OF JULY 15, 1932 (D.C. CODE,
 SECS. 24-203-24-207, .(A) ANY PERSON ENGAGING IN AN OFFENSE
 PUNISHABLE UNDER SECTION 841(b)(1)(A) OF THIS TITLE OR SECTION 960
 (b)(1).(g)(!1) TO (P) REPEALED. PUB. L. 109-177, TITLE II, SEC. 221(2), MAR
 .9 2006, 120 stat. 231(q) REPEALED. PUB. L. 109-177, title II, SECS. 221
 (4), 222(C), MAR. 9, 2006, 120 stat. 231, 232(r) REPEALED. PUB. L. 109-177,
 TITLE II, SEC. 221(3), MAR. 9, 2006, 120 STAT. 231(S) MANDATORY MINIMUM
 FOR CONTINUING CRIMINAL ENTERPRISE: 21 u.s.c. § 848 A PERSON IS
 ENGAGED IN A CONTINUING CRIMINAL ENTERPRISE, IF ALL OF THE FOLLOW
 /ING, ARE MET: (1) SHE OR HE COMMITS A FELONY VIOLATION OF ANY OF
 21 u.s.c. §§ 801 et seq. or 951 et seq., and (2) THE VIOLATION IS
 PART OF A CONTINUING SERIES OF VIOLATIONS OF §§ 801 et seq. or 951
 et seq., and (3) THE VIOLATION IS UNDER TAKEN IN CONCERT WITH 5 or
 MORE PEOPLE, AND (4) THE PERSON OCCUPIES THE POSITION OF ORGANIZER, A

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SUPERVISORY POSITION,OR ANY OTHER MANAGEMENT POSITION WITH
RESPECT TO THOSE 5 TOP PEOPLE,AND (5)THE PERSON OBTAINS
SUBSTANTIAL INCOME OR RESOURCES FROM VIOLATIONS OF §§ 801 et
seq.or 951 et seq.THE DEFENDANT IS HOLDING ALL OF THE PLAINTIFFS
AS HOSTAGES.HOSTAGE TAKING"(18 u.s.c.1203.AND WE ARE MAKING A
CHARGE OF TERRORISM TRANSCENDING NATIONAL BOUNDARIES(18 u.s.c.
§ 2332 b).TERRORISM TRANSCENDING NATIONAL BOUNDARIES(18 u.s.c. §
2332 b).THESE LIES CAME FROM THE BOOK AS FIGHT CPS HAND BOOK,
SOMETHING FOR THE PEOPLE.WORDPRESS.COM SOMETHINGFORTHEPEOPLE
MOBILE-FRIENDLY-FIGHT CPS HAND BOOK.CHILD PROTECTIVE SERVICES AND
THE JUVENILE JUSTICE SYSTEM.A GUIDE TO PROTECT THE PEOPLE.THESE
LIES CAME FROM THE PROFILE OF THE BOOK AS FIGHT CPS HAND BOOK,
SOMETHING FOR THE PEOPLE,.AND ATTORNEY AS KAILYN HESTON,AND A
DHS WORKER DELIBERATELY VIOLATED MY CONSTITUTIONAL RIGHTS.AS WELL
AS THE OTHER DEFENDANTS,THIS IS ALSO FRAUD,SHE HAS VIOLATED OUR
1st,4th,5th,6th,8th,9th,14th,AMENDMENT TO THE CONSTITUTION.WE
WANT JUSTICE UNDER OUR CONSTITUTIONAL RIGHTS IMMEDIATELY.

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(13)

THE STATE OF IOWA", IS LIABLE FOR ANY AND EVERYTHING THAT BOTH
~~Robert Hanson~~, ~~William Price~~, ~~John A. Jarvey~~, ~~Gregory Brandt~~,
 JUDGES AS JOSEPH SEIDLIN, AND PRICE AND JOHN A. JARVEY, AND A
~~martha mertz~~,
 EMILY NIEMAN, VIOLATED IN THEIR OWN CAPACITY. THE STATE OF IOWA
 HAVE NOT VIOLATED ANY JUDICIAL ACTS, OR LAWS. THEREFORE, THE STATE
 OF IOWA DO NOT HAVE ANY IMMUNITY BECAUSE ALL THE ACTS THAT TOOK
 PLACE ARE KNOWN AS NON-JUDICIAL ACTS. A NON-JUDICIAL ACT IS SOME
 THING THAT IS NOT PROTECTED BY IMMUNITY, .ALL PLAINTIFFS, RIGHTS
 HAVE BEEN VIOLATED AS OUR 1st, 4th, 5th, 6th, 8th, 9th, 14th, AMENDMENTS
 TO THE CONSTITUTION. "JURISDICTIONAL BASIS" PLAINTIFF'S CLAIMS
 FEDERAL JURISDICTION PURSUANT TO ARTICLE III § 2 WHICH EXTENDS
 THE JURISDICTION TO CASES ARISING UNDER THE U.S. CONSTITUTION. II
 PLAINTIFF'S BRINGS THIS SUIT PURSUANT TO TITLE 42 U.S. CODE § 1983
 FOR VIOLATIONS OF CERTAIN PROTECTIONS GUARANTEED TO US BY THE
 FIRST, FIFTH, EIGHTH, NINTH, FOURTEENTH, AND FOURTH, AMENDMENTS RIGHTS
 TO THE CONSTITUTION. AND THE SIXTH AMENDMENT RIGHT TO THE CONSTITU
 /TION. BY THE DEFENDANT AS THE STATE OF IOWA, UNDER COLOR OF LAW, IN
 THEIR OWN CAPACITY AS THE STATE OF IOWA. IN POLK COUNTY, THE STATE
 IS LIABLE FOR JUDGE PRICE, AND JUDGE JOSEPH SEIDLIN, AND JOHN A.
~~John A. Jarvey~~, ~~Robert Hanson~~, ~~Gregory Brandt~~, ~~William Price~~, ~~martha mertz~~,
 JARVEY, ORDERS. AND THEY ARE LIABLE FOR A EMILY NIEMAN, FALSE
 STATEMENTS UNDER OATH, .AND FOR HER NEGLIGENCE, IN FILING (4)
 CASES OF CHILD IN NEED OF ASSISTANCE CASES ON ALL THE PLAINTIFFS,
 AS A DAVION L. BARBER, AND A MARKEVION K. JONES, AND A KORYON L. BROW/
 DER, AND A LAYOSHA N. BROWDER, AND ON A DARRYL K. BROWDER, .THE PLAIN/
 TIFF'S ASK FOR DAMAGES AT THE MAXIMUM LEGAL RATE FOR VIOLATION OF
 OUR SEIZURE RIGHTS, AND OUR WARRANT CLAUSE, AND OUR ANONYMOUS CALLS
 RIGHTS AND CLAUSE, .AND OUR PROBABLE CLAUSE, AND OUR PARENTAL RIGHT
 AS FUNDAMENTAL AND DUE PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT
 TO THE CONSTITUTION. AND FOR VIOLATION OF OUR EQUAL PROTECTION
 CLAUSE OF THE FOURTEENTH AMENDMENT TO THE CONSTITUTION.

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AND FOR VIOLATION OF ALL THE PLAINTIFF'S, HIPAA CLAUSE UNDER THE FOURTH, AND FOURTEENTH, AND FIFTH, AMENDMENTS TO THE CONSTITUTION. PLAINTIFFS, ALSO ASK FROM THE STATE OF IOWA AS 9.1. DAMAGES, AS 9.1.A. COMPENSATORY DAMAGES, AND PUNITIVE DAMAGES, .AND LIQUIDATED DAMAGES, AS WELL AS SUBSTANTIAL DAMAGES FOR INJURIES. AND ALSO WE ASK FOR STATUTORILY AUTHORIZED COMPENSATORY DAMAGES, AND NOMINAL DAMAGES, .AND ALSO WE ASK THIS COURT FOR GENERAL COMPENSATORY DAMAGES, AND FOR SPECIAL DAMAGES AND PROVISIONS. GENERAL DAMAGES AS IN TANGIBLE, PSYCHOLOGICAL INJURIES AS WELL AS FINANCIAL, PROPERTY, OR PHYSICAL HARMS PROXIMATELY CAUSED BY THE WRONGFUL CONDUCT. COMPENSABLE LOSSES MAY INCLUDE MEDICAL BILLS, LOSS OF WAGES, LOST OR DIMINISHED EARNINGS, LOST PROFITS, PROPERTY DAMAGE OR LOSS, PAIN AND SUFFERING, OR MENTAL AND EMOTIONAL DISTRESS. AND EXEMPLARY OR PUNITIVE DAMAGES TO DETER OR PUNISH MALICIOUS DEPRIVATIONS OF RIGHTS UNDER THE CONSTITUTION. AND WE ASK FOR DAMAGES FOR LOSS OF QUALITY OF LIFE. AND WE ASK THIS COURT FOR DAMAGES FOR THE STATE AND THEIR ACTORS VIOLATING OUR TRUTH IN LENDING ACT. 1, 2, 3, 4, .

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THE COUNTY, 111 COURT AVE., RM. 340 DES MOINES, IOWA 50309. IS LIABLE, FOR ANY AND EVERYTHING THAT ATTORNEY AS KAILYN HESTON, FILED ON THE PLAINTIFFS, AS FOUR CASES OF CHILD IN NEED OF ASSISTANCE CASES AS CASES JV238648, jv238649, jv238659, jv238651, AND THEY ARE ALSO LIABLE FOR ATTORNEY AS KAILYN HESTON, FILING A REMOVAL ORDER IN VIOLATION OF PLAINTIFF'S FOURTH, AND FOURTEENTH, AMENDMENTS TO THE CONSTITUTION. AND OUR FIFTH AMENDMENT RIGHT TO THE CONSTITUTION, .THE REMOVAL ORDER, WAS FILED ON APRIL/9th/2015, .THE COUNTY, THE COUNTY HAS MADE A ATTEMPT IN BAD FAITH TO EVADE FEDERAL JURISDICTION, ON THESE CHILD IN NEED OF ASSISTANCE CASES. THE FEDERAL COURT HAS THE POWER AND DISCRETION TO ACCEPT THE CASE AS A WHOLE OR REMAND THE ISSUES OF STATE LAW. THE COUNTY HAS NOT VIOLATED ANY NON-JUDICIAL ACTS. THE COUNTY HAS VIOLATED OUR CONSTITUTIONAL RIGHTS TO THE CONSTITUTION? LIKE OUR 1st, 4th, 5th, 6th, 8th, 9th, AND OUR 14th, AMENDMENT RIGHTS TO THE CONSTITUTION. IN THIS CASE THERE IS NO IMMUNITY BECAUSE ALL THE ACTS THAT TOOK PLACE ARE KNOWN AS NON-JUDICIAL ACTS. A NON-JUDICIAL ACT IS SOMETHING THAT IS NOT PROTECTED BY IMMUNITY, THIS DEFENDANT SHOULD NOT BE ABLE TO AVAIL THEIR SELF OF ANY IMMUNITY. "JURISDICTIONAL BASIS" PLAINTIFF; S CLAIMS FEDERAL JURISDICTION PURSUANT TO ARTICLE III § 2 WHICH EXTENDS THE JURISDICTION TO CASES ARISING UNDER THE U.S. CONSTITUTION, .II PLAINTIFF'S BRINGS THIS SUIT PURSUANT TO TITLE 42 U.S. CODE § 1983 FOR VIOLATIONS OF CERTAIN PROTECTIONS GUARANTEED TO US PLAINTIFF'S, BY THE FIRST, FIFTH, EIGHTH, NINTH, FOURTH, FOURTEENTH, AND THE SIXTH, AMENDMENTS TO THE CONSTITUTION, .BY THE DEFENDANT AS THE COUNTY UNDER COLOR OF LAW, IN ITS OWN CAPACITY AS THE COUNTY. IN POLK COUNTY, AND THE DEFENDANT AS THE COUNTY VIOLATED OUR HIPAA RIGHTS, THERE HAS BEEN A BREACH, IN ALL THE PLAINTIFF'S

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MEDICAL RECORDS. ALSO THE DEFENDANT HAS VIOLATED ALL PLAINTIFF'S, SEIZURE LAWS, AND OUR WARRANT CLAUSE, AND OUR ANONYMOUS CALLS CLAUSE. AND HAS ALSO VIOLATED OUR PROBABLE CAUSE, AND OUR PARENTAL RIGHTS AS FUNDAMENTAL AND DUE PROCESS CLAUSE OF THE 14th, and 5th, AMENDMENTS TO THE CONSTITUTION. AND THEY HAVE ALSO VIOLATED OUR EQUAL PROTECTION CLAUSE OF THE FOURTEENTH AMENDMENTS TO THE CONSTITUTION. YICK WO V. HOPKINS, 118 US 355, (1886). ALSO 9.1. DAMAGES, 9.1.A. COMPENSATORY DAMAGES, AND PUNITIVE DAMAGES, AND WE PLAINTIFF'S, ASK THIS COURT FOR LIQUIDATED DAMAGES, AND SUBSTANTIAL DAMAGES, AND FOR INJURIES, AND FOR STATUTORILY AUTHORIZED COMPENSATORY DAMAGES, AND FOR NOMINAL DAMAGES, AND FOR GENERAL COMPENSATORY DAMAGES. AND SPECIAL DAMAGES PROVISIONS, AND FOR LOSS OF QUALITY OF LIFE, AND WE WANT MONEYS FOR TANGIBLE, PSYCHOLOGICAL INJURIES AS WELL AS FINANCIAL, PROPERTY, OR PHYSICAL HARMS PROXIMATELY CAUSED BY THE WRONGFUL conduct. compensable losses may include medical bills, lost or DIMINISHED EARNINGS, LOST PROFITS, LOSS OF WAGES, PROPERTY DAMAGES, OR LOSS, PAIN AND SUFFERING, OR MENTAL AND EMOTIONAL DISTRESS. EXEMPLARY OR PUNITIVE DAMAGES TO DETER OR PUNISH MALICIOUS DEPRIVATIONS OF RIGHTS, UNDER THE CONSTITUTION. AND FOR LOWER QUALITY OF LIFE FOR MONTHS, YEARS, DAYS, FROM THE PLAINTIFFS.

CERTIFICATE OF SERVICE
 I, the undersigned, certifies that the foregoing instrument has been served on all parties to the above cause to each of the addresses disclosed herein at their respective addresses disclosed herein on 07-23-2015.

☒ Overnight Courier ☐ FAX ☐ Other
☒ Delivered ☐ U.S. Mail
☒ Registered Mail ☐ Scanned

Darryl K. Browder
Darrell Browder

Darryl K. Browder
Davion L. Barber
Laysha N. Browder
Koryon L. Browder
Marken Jones
Darrell Browder
P.O. Box 41413 Des Moines, Iowa
50311.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DARRYL KEITH BROWDER, AND
Koryn Browder, DARNELL A. BROWDER,
Laysha N. Browder, Markelion Jones, Davion Barber.

(b) County of Residence of First Listed Plaintiff

POLK

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

P.O. BOX 41413 DES MOINES, IOWA
50311, PHONE NUMBER 515/
DARNELL BROWDER PHONE: 515/339/3425

DEFENDANTS

THE STATE OF IOWA, Kellen B. Rubach,
John A. Jarvey, THE COUNTY, ET AL.

County of Residence of First Listed Defendant

WILLIAM GRAHAM, .

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

PTF DEF

Citizen of This State

1 1

Incorporated or Principal Place of Business in This State

4 4

Citizen of Another State

2 2

Incorporated and Principal Place of Business in Another State

5 5

Citizen or Subject of a Foreign Country

3 3

Foreign Nation

6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<div><input type="checkbox"/> 110 Insurance</div> <div><input type="checkbox"/> 120 Marine</div> <div><input type="checkbox"/> 130 Miller Act</div> <div><input type="checkbox"/> 140 Negotiable Instrument</div> <div><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</div> <div><input type="checkbox"/> 151 Medicare Act</div> <div><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)</div> <div><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</div> <div><input type="checkbox"/> 160 Stockholders' Suits</div> <div><input type="checkbox"/> 190 Other Contract</div> <div><input type="checkbox"/> 195 Contract Product Liability</div> <div><input type="checkbox"/> 196 Franchise</div>	<div><div>PERSONAL INJURY</div><div><input type="checkbox"/> 310 Airplane</div><div><input type="checkbox"/> 315 Airplane Product Liability</div><div><input checked="" type="checkbox"/> 320 Assault, Libel & Slander</div><div><input type="checkbox"/> 330 Federal Employers' Liability</div><div><input type="checkbox"/> 340 Marine</div><div><input type="checkbox"/> 345 Marine Product Liability</div><div><input type="checkbox"/> 350 Motor Vehicle</div><div><input type="checkbox"/> 355 Motor Vehicle Product Liability</div><div><input type="checkbox"/> 360 Other Personal Injury</div><div><input checked="" type="checkbox"/> 362 Personal Injury - Medical Malpractice</div></div> <div><div>PERSONAL INJURY</div><div><input type="checkbox"/> 365 Personal Injury - Product Liability</div><div><input type="checkbox"/> 367 Health Care/Pharmaceutical</div><div><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</div></div> <div><div>PERSONAL PROPERTY</div><div><input type="checkbox"/> 370 Other Fraud</div><div><input type="checkbox"/> 371 Truth in Lending</div><div><input type="checkbox"/> 380 Other Personal Property Damage</div><div><input type="checkbox"/> 385 Property Damage Product Liability</div></div>			

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from Another District (specify)

6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Intentional infliction of emotional distress, conspiracy, bad faith, due process, AND EIGHTH, AND FOURTH AMENDMENT RIGHTS, NEGLIGENCE,

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 3,000,000 million

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

Brundt, Jarvey, Row, Hanson, SV238640, SV238641, 4:04-cv-00130-Row, SV238649, SV238651, CV046190, DOCKET NUMBER SR264426, Mertz, Cappola

DATE

07/16/15

SIGNATURE OF ATTORNEY OF RECORD

Darnell Allen Browder, Darryl K. Browder et al

IX. OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE